REMARKS

Reconsideration of this application, in view of the foregoing amendment and the following remarks, is respectfully requested.

Claims 1-45 were originally presented for consideration in this application. Claims 5, 18, 32 and 35 have been canceled. Accordingly, claims 1-4, 6-17, 19-31, 33, 34 and 36-45 are currently pending in this application.

The following rejections, objections, and requirements were set forth in the Office Action:

1. The specification is objected to for insufficient identification of the cross-referenced applications;

2. Claim 21 is objected to for lack of antecedent basis for "the continuous flow passage" recited in the claim;

3. Claims 1-5, 7-20, 25, 26, 28-35, 37-40 and 42-45 stand rejected under 35 USC §102(b) as being anticipated by U.S. Publication No. 2002/0125008 to Wetzel, et al.;

4. Claims 1, 7-9, 11, 13-17, 19-23, 28, 29, 31-35, 37 and 38 stand rejected under 35 USC §102(b) as being anticipated by U.S. Patent No. 6,478,091 to Gano;

5. Claims 1, 5-7, 11, 12, 14, 17, 19, 20, 28-30, 37 and 38 stand rejected under 35 USC §102(b) as being anticipated by U.S. Patent No. 6,758,272 to Bixenman, et al.;

6. Claims 24 and 36 stand rejected under 35 USC §103 as being unpatentable over Wetzel, Gano or Bixenman in view of U.S. Patent No. 6,349,770 to Brooks, et al.; and

7. Claims 27 and 41 stand rejected under 35 USC §103 as being obvious over Wetzel in view of U.S. Patent No. 6,006,828 to Kluth, et al.

Regarding the objection to the specification, please note that the paragraph following the Cross-Reference to Related Applications section heading has been amended to state the serial nos. of the cited applications.

Regarding the objection to claim 21, please note that this claim has been amended above to make it clear that the flow passage recited in this claim is the same flow passage as introduced in claim 11, and that it extends continuously through the multiple assemblies.

Regarding the anticipation rejections based on the Gano reference, please note that each of the independent claims 1, 11 and 28 has been amended above. Claim 1 now recites that the assembly is a gravel packing assembly, and that the wellbore is gravel packed about the assembly. Claim 11 now recites that a fluid loss control device of the assembly opens in response to insertion of a portion of the tubular string into the assembly. Claim 28 now recites that certain flow control devices are interconnected in the tubular string, with each of the flow control devices controlling flow between a particular interior portion of the tubular string and a flow passage of a particular assembly, or between particular interior portions of the tubular string.

Gano describes the screen assembly 12 as being expanded radially outward into contact with the wellbore 20 (see col. 3, lines 46-50). Gano does not describe that the wellbore is gravel packed about the screen assembly. Therefore, Gano does not anticipate amended claim 1 or its dependents.

Gano also does not describe a fluid loss control device which opens in response to insertion of a portion of a tubular string into the assembly as now recited in claim 11. Instead, Gano teaches that flow control devices 46, 48, 50 should be interconnected in the liner assembly 36 (a tubular string) itself and operated by expansion of the liner assembly. Thus, Gano teaches away from the fluid loss control device being a part of the assembly as recited in amended claim 11, and Gano does not anticipate this claim or its dependents.

Gano also does not describe the flow control devices as recited in amended claim 28. The expandable screens 14, 16 of Gano are identified in the Office Action as corresponding to the first and second assemblies recited in the claims. The flow control devices 46, 48 of Gano are identified in the Office Action as corresponding to the first and second flow control devices recited in the claims. However, these flow control devices and assemblies of Gano do not meet the limitations or perform the functions specified in amended claim 28.

For example, claim 28 now recites that the first flow control device controls flow between first and second interior portions of the tubular string. Neither of the flow control devices 46, 48 of Gano controls flow between different interior portions of the liner assembly 36. Therefore, Gano does not anticipate amended claim 28 or its dependents.

Regarding the anticipation rejections based on the Wetzel reference, these rejections are respectfully traversed. Please note that each of independent claims 1, 11 and 28 recites, in one form or another, that an assembly is positioned in a wellbore, and then a portion of a tubular string is inserted into an internal flow passage of the assembly.

The Office Action identifies the perforations 18 of Wetzel as corresponding to the assembly recited in the claims, but it is assumed that this was actually intended to be element 28 (screens). Wetzel does not describe any tubular string being inserted into the screens 28 after the screens are positioned in a wellbore. Therefore, Wetzel does not anticipate independent claims 1, 11 or 28, or their dependents.

If, indeed, it was intended in the Office Action to identify the perforations 18 of Wetzel as corresponding to the assembly recited in the claims, then each of independent claims 1, 11 and 28 still is not anticipated by Wetzel. For example, claim 1 recites that the wellbore is gravel packed about the assembly, claim 11 recites that a fluid loss control device of the assembly opens in response to insertion of the tubular string portion into the assembly, and claim 28 recites that a flow control device controls flow between separate interior portions of the tubular string. These limitations are not described in Wetzel, and for these additional reasons independent claims 1, 11 and 28, and their dependents, are not anticipated by Wetzel.

Regarding the anticipation rejections based on the Bixenman reference, these rejections are respectfully traversed. Each of independent claims 1, 11 and 28 recites, in one form or another, that an assembly is positioned in a wellbore, and then a portion of a tubular string is inserted into an internal flow passage of the assembly.

In the Office Action the lower completion 14 of Bixenman is identified as corresponding to the assembly recited in the claims, and the upper completion 12 of Bixenman is identified as corresponding to the tubular string recited in the claims. However, Bixenman contains no description of a portion of the upper completion 12 being inserted into an internal flow passage of the lower completion 14. Bixenman merely describes the lower completion 14 being installed prior to the upper completion 12.

In addition, Bixenman does not describe a fiber optic line extending within the internal flow passage of the assembly as recited in claim 1, a fluid loss control device of the assembly opening in response to insertion of the tubular string portion into the assembly as recited in claim 11, or a flow control device controlling flow between separate interior portions of the tubular string as recited in claim 28. Therefore, for these additional reasons Bixenman does not anticipate any of independent claims 1, 11 and 28, or their dependents.

Claim 42 has been rewritten in independent form above. This claim was rejected as being anticipated by the Wetzel reference. However, Wetzel clearly does not describe the first assembly including a fluid loss control device as recited in claim 42. Therefore, Wetzel does not anticipate claim 42 or its dependents.

Regarding the obviousness rejections of claims 24, 27, 36 and 41, as discussed above the Wetzel, Gano and Bixenman references do not contain the limitations recited in each of the independent claims 1, 11 and 28. The combination of any of these references with the Brooks or Kluth reference does not cure these deficiencies, and a person skilled in the art would not be motivated to make the modifications of the references proposed in the Office Action. Therefore, a *prima facie* case of obviousness has not been made out for claims 24, 27, 36 and 41.

In view of the foregoing amendment and remarks, all of the claims pending in this application are now seen to be in a condition for allowance. A Notice of Allowance of claims 1-4, 6-17, 19-31, 33, 34 and 36-45 is therefore earnestly solicited.

The examiner is hereby requested to telephone the undersigned attorney of record at (972) 516-0030 if such would expedite the prosecution of the application.

Respectfully submitted,

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